

November 3, 2016

Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street NW
Washington, DC 20436
Sent via email to: CELA@fec.gov



Digitally
signed by
Donna Rawls
Date:
2016-11-04
08:33:09
-04'00'

RE: MUR 7131

Mr. Jordan,

I write on behalf of NGP VAN, Inc. (NGP VAN) in response to the baseless and uninformed follow-up allegations that were leveled by Mr. Griset regarding our business relationship with Senior Votes Count ("SVC") and Carol Shea-Porter for Congress ("CSP"). As detailed in our initial response dated September 15, 2016, NGP VAN is a commercial vendor of software to both Senior Votes Count and Carol Shea-Porter for Congress.

The complainant alleges that there is a "repeating pattern of debt forgiveness between the two parties", referring to NGP VAN and SVC. However, the complainant again fails to substantiate the allegations against NGP VAN. His assertion that NGP VAN forgave any debt owed by SVC has no merit. Had the complainant thoroughly reviewed the publicly available information surrounding the "credits" in question, he would see that the memo text clearly indicates that the credits were in fact due to an "Amount Invoiced in Error".

SVC was billed for services that they had not meant to order and had not, in fact, used. Therefore, their account was credited accordingly for the services invoiced in error (see attached).

As detailed in the accompanying documentation, the SVC requested an adjustment to their account to correct for the fact that our service for Online Contributions was never set up nor used. Please note that the total of the accompanying credit memo corresponds to the amounts referenced in the complainant's follow-up allegations.

This credit was applied within the normal course of business, and in line with long-standing accounting procedures and business practices.

The complainant also alleges that the charges for our services were for voter information lists. That assertion is also false, as the services provided to SVC were for compliance database services only.

Further, the complainant states "I believe that I saw the same type of 'credits' to outstanding debt on the Carol Shea-Porter Campaign Committee filings". The complainant's assertion is completely unfounded, as there is no record, neither with the FEC nor in the Shea-Porter database of any debt ever being reported to NGP VAN. It is impossible for NGP VAN to "forgive" a debt that did not exist.

I strongly urge the Commission to quickly put an end to this waste of time and resources for all involved. The allegations against NGP VAN must not remain unresolved by the Commission. As demonstrated, the complaint against NGP VAN is clearly an effort without factual foundation to tarnish the reputation of our company. I restate that summary dismissal is the proper course for this matter and for denying the complainant the publicity it seeks with this meritless and poorly-informed complaint.

Respectfully,

Louis Levine
Sr. Vice President
NGP VAN, Inc.

10044440001

From: Edie Zornes
To: Louis Levine
Subject: FW: Senior Votes Count - Invoice Issue
Date: Friday, October 28, 2016 1:00:27 PM

Edie Zornes
Accounting Manager, NGP VAN
P. (202) 827-7191

From: Kendra Burns-Edel [mailto:kburns-edel@kaufmanlegalgroup.com]
Sent: Tuesday, December 09, 2014 6:55 PM
To: Edie Zornes <EZornes@ngpvan.com>
Subject: RE: Senior Votes Count - Invoice Issue

Thank you!

Kendra A. Burns-Edel
Political Accounts Supervisor
Kaufman Legal Group
A Professional Corporation
777 S. Figueroa Street, Suite 4050
Los Angeles, CA 90017-5864
Tel: 213.452.6565

Fax: 213.452.6575
Email: kburns-edel@kaufmanlegalgroup.com

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From: Edie Zornes [mailto:EZornes@ngpvan.com]
Sent: Tuesday, December 09, 2014 7:44 AM
To: Kendra Burns-Edel
Cc: Louis Levine
Subject: RE: Senior Votes Count - Invoice Issue

Hi Kendra –

Please see the attached statement with the revised invoices. Let me know if there is anything else needed.

Edie Zornes
Accounting Assistant
NGP VAN, Inc
202.827.7191

From: Louis Levine
Sent: Monday, December 08, 2014 3:48 PM
To: Edie Zornes

Subject: FW: Senior Votes Count - Invoice Issue

I thought I gave you a go ahead on this, but if not, go ahead

From: Kendra Burns-Edel [<mailto:kburns-edel@kaufmanlegalgroup.com>]

Sent: Monday, December 08, 2014 2:22 PM

To: Support

Subject: Senior Votes Count - Invoice Issue

Hi NGP,

This is my second attempt at contacting you regarding this invoice. Please note, the contribution gateway was never set-up for this committee so the committee has not used online contributions at all. Please adjust the invoice to remove the online contribution fee. Please also note that this committee will not be using online contributions, so please do not include on future bills,

Thank you,

Kendra A. Burns-Edel
Political Accounts Supervisor
Kaufman Legal Group
A Professional Corporation
777 S. Figueroa Street, Suite 4050
Los Angeles, CA 90017-5864
Tel: 213.452.6565

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NGP VAN, Inc.

1101 15th Street, NW

Suite 500

Washington, DC 20005

202-686-9330 (202-686-9331 Fax)

Credit Memo

DATE	CREDIT NO.
11/30/2014	81034

CUSTOMER

Senior Vote Counts
777 S Figueora St
#4050
Los Angeles, CA 90017

P.O. NO.	PROJECT
	Senior Vote Counts

DESCRIPTION	QTY	RATE	AMOUNT
Credit for Online Contributions set up	-1	150.00	-150.00
Credit for Online Contributions for May - October 2014 at \$50/month	-6	50.00	-300.00
Credit for Online Contributions for November - December 2014 at \$50/month	-2	50.00	-100.00
Credit memo #81034 , in the amount of \$550, has been applied to invoice # 69663 (\$250) and #70514 (\$300)- this reflects a cancellation of Online Contributions from the beginning of their contract - per Lou.			0.00
		Total	-550.00